

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
MICHAEL HOWARD )  
\_\_\_\_\_ )

APR 23 2 42 PM '04  
CRIMINAL NO. 04-10020-RWZ  
DISTRICT OF MASS

JOINT MEMORANDUM FOR INITIAL STATUS CONFERENCE

The parties submit this joint memorandum addressing the issues set out in Local Rule 116.5(A).

(1) Relief from Rule 116.3 – Discovery Motion Practice:

The parties do not request relief from the schedule set out in Local Rule 116.3.

(2) Expert witness discovery:

The government does not anticipate offering expert witness testimony in this case.

(3) Additional discovery:

The government has produced the automatic discovery required under the Local Rules. Defense counsel will need more time to review this material.

(4) Motion date:

The parties agree that it is premature, at this point, to set a schedule for other motions, because the defendant does not yet know what, if any, motions he must file.

(5) Excludable delay:

The parties are filing a motion and proposed order, asking the Court to exclude, under

Local Rule 112.2(A)(2), the 14 days from the end of the initial twenty-eight day discovery period to the date on which the initial status conference was scheduled, namely from March 31, 2004 through April 14, 2004. The motion also asks the Court to exclude, under 18 U.S.C. § 3161(h)(8)(A), the time from April 26, 2004 through the interim status conference.

(6) Trial likelihood and length:

If there is a trial, it will likely last approximately one week.

(7) Final/interim status conference:

The parties ask the Court to schedule an interim status conference in July 2004.


Respectfully submitted,

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